

EXHIBIT C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
GOVERNMENT EMPLOYEES INSURANCE CO., et al

Plaintiffs,

Docket No.: CV 11-CV-3781

-against-

THREEONIX SUPPLY CORP., et al

Defendants
-----X

DECLARATION OF SUNIL KHANDPUR

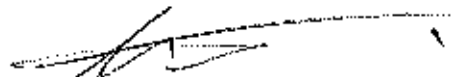
I, Sunil Khandpur, being duly sworn, depose and say under penalty of perjury that:

1. I am employed by Government Employees Insurance Company, GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co., (collectively known as "GEICO") as Manager of No-Fault Claims (PIP).
2. I have personal knowledge of the facts set forth in this declaration and would testify to them in a Court of law if called upon to do so.
3. I respectfully submit this declaration in support of GEICO's motion for default judgment against Defendant Ropa, Inc. ("Ropa"), a wholesaler affiliated with Leica Supply, Inc. ("Leica")
4. GEICO requests a judgment on default against Ropa on its eighth cause of action for federal mail fraud in violation of 18 U.S.C. 1962(d) and on its eleventh causes of action for aiding and abetting.
5. In preparing this affidavit in support of plaintiff's motion for a default judgment I undertook the following tasks:

- a. I requested that a GEICO systems analyst perform a run in GEICO's system showing the number of payments and amounts that GEICO issued based upon claims submitted by Leica,. The payment information contained in this spreadsheet was gleaned from GEICO's database by use of the provider tax identification number . Upon approval, GEICO generates and issues a check for payment by inputting specific information into its system. All the payments are organized in accordance with the tax identification number assigned to a particular provider. The information contained in GEICO's system is inputted, generated and maintained in its regular course of business.
6. Exhibit "1" to my declaration is a spreadsheet detailing the total amount of voluntary payments issued to Leica, by GEICO as a result of claims Leica submitted. According to Exhibit "1", GEICO issued a total payment in the amount of \$48,906.76 to Leica, which GEICO is seeking to recover in this action against Defendant Leica. The nature of these payments is detailed in Exhibit "2" to my declaration.

I declare under penalty of perjury that the foregoing is true and accurate. Executed at Woodbury, New York on

March 30th, 2012



Sunil Khandpur

DANUTA H. GAWEDA
Notary Public, State of New York
No. 01GA6170104
Qualified in Queens County
Commission Expires July 02, 20 15

EXHIBIT C-1

MASTER (HYPERLINK)		LEICA SUPPLY
Date updated		3/9/2012
Action Date		8/4/2011
Firm		SPINA
Venue		EASTERN DIST
Index		CV - 03781
Treatment		DME
Basis of Complaint		
TIN		743237399
Amount Billed		\$463,848.67
First DOS billed		11/11/2007
Last DOS billed		10/22/2009
Total Paid	\$	79,457.68
Voluntary Payments	\$	48,906.76
Interest Payments	\$	7,674.85
Litigation Payments	\$	22,876.07
Expense Payments	\$	-
Exposure	\$	392,065.84
Number of Total Suits Pending		133
Number with Outside Counsel		3
Total Suit Ad Damnum Pending	\$	282,190.87
Number of Arbs Pending		-
Total Arb Ad Damnum Pending	\$	-
Total Litigation Ad Damnum	\$	282,190.87
EXPOSURE LESS PENDING LIT =	\$	109,874.97

EXHIBIT C-2

PROVIDER	CLAIM_NUMBER	COMPANY_ACCOUNTING_DRAFT_NUMBER	TRANSACTION_AMOUNT	TAX_ID_NUMBER
LEICA SUPPLY	0367910380101011	GI 7/30/2010	118202825	1714.06
LEICA SUPPLY	0367910380101011	GI 9/2/2010	085282613	570
LEICA SUPPLY	0367910380101011	GI 9/2/2010	085282611	379.06
LEICA SUPPLY	0367910380101011	GI 9/10/2010	085320645	1299.2
LEICA SUPPLY	0330691680101018	GI 1/10/2008	082901181	1040
LEICA SUPPLY	0307320140101033	GI 1/11/2008	101354100	1040
LEICA SUPPLY	0307320140101033	GI 1/11/2008	101354101	1040
LEICA SUPPLY	0307320140101033	GI 1/11/2008	101354102	1040
LEICA SUPPLY	0329157080101019	GI 2/8/2008	082940400	514.22
LEICA SUPPLY	0121100990101018	GG 4/14/2008	083080210	1040
LEICA SUPPLY	0326916430101018	GG 4/15/2008	083082753	380
LEICA SUPPLY	0314061810101025	GG 4/17/2008	083090710	658.22
LEICA SUPPLY	0121100990101018	GG 4/28/2008	083080210	-1040
LEICA SUPPLY	0121100990101018	GG 4/28/2008	083106273	1040
LEICA SUPPLY	0274705370101027	GG 5/5/2008	083115242	493.29
LEICA SUPPLY	0314061810101025	GG 5/13/2008	102636967	570
LEICA SUPPLY	0314061810101025	GG 5/13/2008	083090710	-658.22
LEICA SUPPLY	0314061810101025	GG 5/13/2008	102636519	658.22
LEICA SUPPLY	0342759710101013	GI 5/13/2008	083140489	145
LEICA SUPPLY	0245147780101089	GI 6/9/2008	083222770	747.47
LEICA SUPPLY	0210803070101038	GI 6/16/2008	102974464	110
LEICA SUPPLY	0275084220101010	GI 6/16/2008	102968919	604.97
LEICA SUPPLY	0335872470101013	GI 6/19/2008	083239847	1040
LEICA SUPPLY	0326916430101018	GG 7/23/2008	083082753	-380
LEICA SUPPLY	0326916430101018	GG 7/23/2008	103354954	380
LEICA SUPPLY	0245147780101089	GI 7/24/2008	083304914	1039.06
LEICA SUPPLY	0130060760101045	GG 10/21/2008	083525478	1039.06
LEICA SUPPLY	0124575450101011	GG 11/24/2008	083592636	110
LEICA SUPPLY	0338370120101027	GI 12/16/2008	083629079	1587.62
LEICA SUPPLY	0999268700101021	GI 12/18/2008	083631896	1414.08
LEICA SUPPLY	0307240600101010	GI 3/13/2009	084085856	1301.33
LEICA SUPPLY	0307240600101010	GI 3/13/2009	084085855	1141.33
LEICA SUPPLY	0307240600101010	GI 3/13/2009	084085853	926.43
LEICA SUPPLY	0307240600101010	GI 3/13/2009	084085853	926.43

LEICA SUPPLY	0333476920101029	GI	4/1/2009	084114491	1039.06	74-3237399
LEICA SUPPLY	0307240600101010	GI	4/9/2009	084127830	194.06	74-3237399
LEICA SUPPLY	0308229800101010	GG	4/10/2009	113126171	422	74-3237399
LEICA SUPPLY	0307240600101010	GI	4/16/2009	084137367	854.06	74-3237399
LEICA SUPPLY	0307240600101010	GI	4/22/2009	084214734	854.06	74-3237399
LEICA SUPPLY	0346312950101014	GI	4/23/2009	113258329	422	74-3237399
LEICA SUPPLY	0348312950101014	GI	4/23/2009	113258330	422	74-3237399
LEICA SUPPLY	0338858140101027	GI	5/7/2009	083834795	66.81	74-3237399
LEICA SUPPLY	0338858140101027	GI	5/12/2009	083840117	650.13	74-3237399
LEICA SUPPLY	0177429710101047	GG	5/19/2009	083850944	72.55	74-3237399
LEICA SUPPLY	0336671420101019	GI	6/24/2009	083908753	1227.45	74-3237399
LEICA SUPPLY	0351264050101010	GI	6/26/2009	113950892	379.06	74-3237399
LEICA SUPPLY	0178850140101027	GI	7/22/2009	114211971	611	74-3237399
LEICA SUPPLY	0336671420101019	GI	7/23/2009	083970911	194.06	74-3237399
LEICA SUPPLY	0282580320101025	GI	8/3/2009	083997492	874.94	74-3237399
LEICA SUPPLY	0284379880101014	GI	8/3/2009	114346246	40	74-3237399
LEICA SUPPLY	0355852390101017	GI	8/3/2009	114336912	1012.36	74-3237399
LEICA SUPPLY	0336671420101019	GI	8/7/2009	084006555	1144.06	74-3237399
LEICA SUPPLY	0312602170101014	GG	8/10/2009	084009928	18.75	74-3237399
LEICA SUPPLY	0284379880101014	GI	8/11/2009	084011364	72.55	74-3237399
LEICA SUPPLY	0336671420101019	GI	8/13/2009	084031481	950	74-3237399
LEICA SUPPLY	0336671420101019	GI	8/13/2009	084030891	640.94	74-3237399
LEICA SUPPLY	0338858140101027	GI	8/19/2009	084286706	194.06	74-3237399
LEICA SUPPLY	0269053000101035	GI	8/20/2009	084288355	110	74-3237399
LEICA SUPPLY	0338858140101027	GI	8/26/2009	084298686	570	74-3237399
LEICA SUPPLY	0271541310101048	GI	9/1/2009	114667277	185	74-3237399
LEICA SUPPLY	0338858140101027	GI	9/1/2009	084307927	751.16	74-3237399
LEICA SUPPLY	0307240600101010	GI	9/2/2009	084310987	169.5	74-3237399
LEICA SUPPLY	0282580320101025	GI	9/3/2009	084312243	773.95	74-3237399
LEICA SUPPLY	0307240600101010	GI	9/3/2009	084312746	169.5	74-3237399
LEICA SUPPLY	0338858140101027	GI	9/8/2009	084317047	1144.06	74-3237399
LEICA SUPPLY	0355852390101017	GI	9/11/2009	114759997	1144.06	74-3237399
LEICA SUPPLY	0256069100101043	GG	9/14/2009	084325257	246.59	74-3237399
LEICA SUPPLY	0338858140101027	GI	9/24/2009	084349289	660	74-3237399

LEICA SUPPLY	0336671420101019	GI	9/29/2009	084356229	570	74-3237399
LEICA SUPPLY	0367910380101011	GI	9/30/2009	084358003	75	74-3237399
LEICA SUPPLY	0367910380101011	GI	10/6/2009	084369004	1067.45	74-3237399
LEICA SUPPLY	0307240600101010	GI	10/8/2009	084137367	-854.06	74-3237399
LEICA SUPPLY	0307240600101010	GI	10/8/2009	115057605	854.06	74-3237399
LEICA SUPPLY	0336671420101019	GI	10/15/2009	084386342	427	74-3237399
LEICA SUPPLY	0336671420101019	GI	12/8/2009	084531216	1082.51	74-3237399
LEICA SUPPLY	0373574390101015	GI	2/22/2010	116504316	1247.36	74-3237399
LEICA SUPPLY	0367910380101011	GI	8/8/2010	118291249	3173.26	74-3237399